UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SEP 29 1995

Mr. David Pasquale
President
Col-Fin Specialty Steel Corporation
100 Front Street
Fallston, Pennsylvania 15066

RE: Emergency Planning and Community Right to Know Act Administrative Complaint
EPA Docket No. EPCRA-III-170

Dear Mr. Pasquale:

Enclosed you will find an Administrative Complaint concerning violations of the Emergency Planning and Community Right to Know Act ("EPCRA"), 42 U.S.C. §11021 et seq., at the Col-Fin Specialty Steel Corporation's ("Col-Fin") facility located at 100 Front Street in Fallston, Pennsylvania. This complaint is based upon evidence obtained during an inspection conducted on May 23, 1995 to determine compliance with EPCRA, 42 U.S.C. §11021 et seq. You should carefully read and analyze the Administrative Complaint to determine the various options available to you in responding to the alleged violations and proposed penalties.

Col-Fin must file an Answer to this Administrative Complaint within twenty (20) days of its receipt. The Answer must respond specifically to each of the allegations set forth in the Complaint. Failure to file an Answer within twenty (20) days of your receipt shall constitute an admission of the allegations made in the Complaint, and shall result in the filing of a Motion for a Default Order and the possible issuance of a Default Order imposing the penalty proposed in the Complaint without further proceedings.

Col-Fin may choose to request a hearing to contest any matter set forth in the Complaint. Such request must be included in Col-Fin's Answer to this Complaint. Whether or not a hearing is requested, Col-Fin may request an informal settlement conference to discuss resolution of this case. A request for a settlement conference may be included in Col-Fin's Answer or Col-Fin may contact the attorney assigned to this case:

Yvette C. Roundtree (3RC13)
Assistant Regional Counsel
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Ms. Roundtree can be reached by telephone at (215) 597-2406.

Sincerely,

Thomas C. Voltaggio, Director
Hazardous Waste Management Division

Enclosures

cc: Robert Broyles, Chief - Chemical Preparedness Division, Pennsylvania Emergency Management Council

Stephanie Branche, Enforcement Coordinator - United States Environmental Protection Agency, Region III, Hazardous Waste Management Division

BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

IN THE MATTER OF:	)
	)
COL-FIN SPECIALTY STEEL CORPORATION 100 Front Street Fallston, Pennsylvania 15066	)
	) Docket No. EPCRA-III-170
Respondent.	)
	) Administrative Complaint under §§ 311, 312 and 325 of the Emergency Planning and Community Right-to-Know Act; 42 U.S.C. §§ 11021, 11022, and 11045.

ADMINISTRATIVE COMPLAINT

This Administrative Complaint ("Complaint") is issued under the authority vested in the Administrator of the United States Environmental Protection Agency ("EPA") by Section 325 of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42 U.S.C. §11045 and 40 C.F.R. §22.14(d). The Administrator of EPA has delegated this authority under EPCRA to the Regional Administrators by EPA Delegation No. 22-3-A, dated October 31, 1989. This authority was further delegated to the Director, Hazardous Waste Management Division by EPA Regional Delegation No. 22-3 dated December 13, 1990. The Director, Hazardous Waste Management Division, EPA Region III

("Complainant"), issues this Complaint against COL-FIN SPECIALTY STEEL CORPORATION ("Respondent") for violations of EPCRA Sections 311 and 312, 42 U.S.C. §§11021 and 11022, and alleges the following:

COUNT I

1. Respondent is a Pennsylvania corporation with its principal place of business located at 100 Front Street in Fallston, Pennsylvania 15066.

2. Respondent is a "person" as defined under § 329(7) of EPCRA, 42 U.S.C. §11049(7).

3. At all times relevant to this Complaint, Respondent owned and/or operated a "facility," as defined under § 329(4) of EPCRA, 42 U.S.C. §11049(4), located at 100 Front Street in Fallston, Pennsylvania, (hereinafter "the facility").

4. At all times relevant to this Complaint, the Respondent produced, used or stored Sulfuric Acid (Chemical Abstract Service Number ["CAS No."] 7664-93-9), Liquid Nitrogen (CAS No. (7727-37-9), Calcium Hydroxide (CAS No. 1305-62-0), and Ferrous Sulfate (CAS No. 7782-63-0) at the facility.

5. Sulfuric Acid, Liquid Nitrogen, Calcium Hydroxide, and Ferrous Sulfate are "hazardous chemicals" within the meaning of Sections 311(e) and 312(c) of EPCRA, 42 U.S.C. §§11021(e) and

11022(c), because they are hazardous chemicals within the meaning of 29 C.F.R. Part 1910.1200(c).

6. Section 311 of EPCRA, 42 U.S.C. §11021, requires that for each "hazardous chemical" present at a facility in quantities equal to or greater than the minimum threshold level, the owner and/or operator of the facility shall submit, on or before October 17, 1987, an MSDS ("Material Safety Data Sheet") or list of hazardous chemicals to the Local Emergency Planning Committee ("LEPC"), the State Emergency Response Commission ("SERC") and to the fire department with jurisdiction over the facility or within three months after the owner or operator is required to prepare or have available an MSDS or list of hazardous chemicals.

7. The threshold planning quantity ("TPQ") level for Sulfuric Acid is 500 pounds, as defined at § 311(b) of EPCRA, 42 U.S.C. §11021(b). The TPQ for Liquid Nitrogen, Calcium Hydroxide, and Ferrous Sulfate is 10,000 pounds, as defined at § 311(b) of EPCRA, 42 U.S.C. §11021(b).

8. At all times relevant to this action, Respondent did keep quantities of Sulfuric Acid, Liquid Nitrogen, Calcium Hydroxide, and Ferrous Sulfate equal to or greater than the TPQ present at the facility.

9. Respondent was obligated to submit MSDSs for, or a list of hazardous chemicals identifying Sulfuric Acid, Liquid

Nitrogen, Calcium Hydroxide, and Ferrous Sulfate on or before October 17, 1987, or within three months after the owner or operator is required to prepare or have available an MSDS or list of hazardous chemicals to the SERC.

10. The SERC for Respondent's facility is the Pennsylvania Emergency Management Council.

11. Respondent did not submit MSDSs for, or a list of hazardous chemicals identifying, Sulfuric Acid, Liquid Nitrogen, Calcium Hydroxide, and Ferrous Sulfate on or before October 17, 1987, or within three months after the owner or operator is required to prepare or have available an MSDS or list of hazardous chemicals to the Pennsylvania Emergency Management Council.

12. Respondent's failure to submit MSDSs for, or list of hazardous chemicals identifying, Sulfuric Acid, Liquid Nitrogen, Calcium Hydroxide, and Ferrous Sulfate to the Pennsylvania Emergency Management Council by October 17, 1987, or within three months after the owner or operator is required to prepare or have available an MSDS or list of hazardous chemicals to violates Section 311 of EPCRA, 42 U.S.C. §11021.

COUNT II

13. The allegations contained in paragraphs 1 through 12 of this Complaint are incorporated herein by reference.

14. Section 312 of EPCRA, 42 U.S.C. §11022, provides that the owner and/or operator of a facility which is required to prepare or have available an MSDS for a hazardous chemical, under the Occupational Safety and Health Act of 1970 (OSHA), 29 U.S.C. §651 et seq., shall also submit a completed Emergency and Hazardous Chemical Inventory Form containing the information described in § 312(d)(1) of EPCRA, 42 U.S.C. §11022(d)(1) to the LEPC, the SERC, and the local fire department with jurisdiction over the facility on or before March 1, 1988, and annually thereafter, and shall contain data with respect to the preceding calendar year.

15. Respondent did not submit Emergency and Hazardous Chemical Inventory Forms for Sulfuric Acid, Liquid Nitrogen, Calcium Hydroxide, and Ferrous Sulfate by March 1, 1993 for calendar year 1992 to the Pennsylvania Emergency Management Council.

16. Respondent's failure to submit completed Emergency and Hazardous Chemical Inventory Forms to the Pennsylvania Emergency Management Council by March 1, 1993 for calendar year 1992 violates Section 312 of EPCRA, 42 U.S.C. §11022.

COUNT III

17. The allegations contained in paragraphs 1 through 16 of this Complaint are incorporated herein by reference.

18. Respondent did not submit Emergency and Hazardous Chemical Inventory Forms for Sulfuric Acid, Liquid Nitrogen, Calcium Hydroxide, and Ferrous Sulfate by March 1, 1994 for calendar year 1993 to the Pennsylvania Emergency Management Council.

19. Respondent's failure to submit completed Emergency and Hazardous Chemical Inventory Forms to the Pennsylvania Emergency Management Council by March 1, 1994 for calendar year 1993 violates Section 312 of EPCRA, 42 U.S.C. §11022.

COUNT IV

20. The allegations contained in paragraphs 1 through 19 of this Complaint are incorporated herein by reference.

21. Respondent did not submit Emergency and Hazardous Chemical Inventory Forms for Sulfuric Acid, Liquid Nitrogen, Calcium Hydroxide, and Ferrous Sulfate by March 1, 1995 for calendar year 1994 to the Pennsylvania Emergency Management Council.

19. Respondent's failure to submit completed Emergency and Hazardous Chemical Inventory Forms to the Pennsylvania Emergency Management Council by March 1, 1995 for calendar year 1994 violates Section 312 of EPCRA, 42 U.S.C. §11022.

PROPOSED EPCRA PENALTY

Section 325(c) of EPCRA, 42 U.S.C. §11045(c), provides that any person who violates any requirement of Section 311 of EPCRA, 42 U.S.C. § 11021 shall be liable to the United States for a civil penalty not to exceed $10,000 per violation; and that any person who violates any requirement of Section 312 of EPCRA, 42 U.S.C. § 11022, shall be liable to the United States for a civil penalty not to exceed $25,000 per violation. Each day a violation of Sections 311 or 312 of EPCRA continues constitutes a separate violation; such penalties may be assessed by Administrative Order. Civil penalties under § 325(c) of EPCRA may be assessed by Administrative Order and are to be assessed and collected in the same manner, and subject to the same provisions, as in the case of penalties assessed and collected after notice and opportunity for hearing on the record in accordance with § 554 of the Administrative Procedure Act, 5 U.S.C. §551 et seq.

On the basis of the violations of EPCRA described above, Complainant has determined that Respondent is subject to penalties for violations of EPCRA Sections 311 and 312, 42 U.S.C. §§11021 and 11022. Accordingly, Complainant proposes to assess penalties in the amount of $68,000.00 pursuant to the authority as set forth below:

Right-to-Know Act, dated June 13, 1990, a copy of which is enclosed was also used in calculating the penalty.

NOTICE OF OPPORTUNITY TO REQUEST A HEARING

Respondent may request, within twenty (20) days of receipt of this Complaint, a hearing before an EPA Administrative Law Judge on the Complaint and at the hearing may contest any material fact and the appropriateness of any penalty amount. To request a hearing Respondent must file a written Answer within twenty (20) days of receipt of this Complaint. The Answer should clearly and directly admit, deny or explain each of the factual allegations contained in this Complaint of which Respondent has any knowledge. Where Respondent has no knowledge of a particular factual allegation, the Answer should so state. Such a statement is deemed to be a denial of the allegation. The Answer should contain: (1) a statement of the facts which constitute the grounds of a defense; (2) a concise statement of the facts which Respondent intends to place at issue in the hearing; and (3) whether a hearing is requested. The denial of any material fact or the raising of any affirmative defense shall be construed as a request for a hearing. Failure of Respondent to admit, deny or explain any material factual allegation contained in the Complaint constitutes an admission of that allegation.

If Respondent fails to file a written Answer within twenty (20) days of receipt of this Complaint, such failure shall constitute an admission of all facts alleged in the Complaint and waiver of the right to a hearing. Failure to file an Answer shall result in the filing of a Motion for Default Order and the possible issuance of a Default Order imposing the penalties proposed herein without further proceedings.

Any hearing requested by Respondent shall be conducted in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and Revocation or Suspension of Permits, 40 C.F.R. Part 22, (hereinafter "Consolidated Rules", a copy of which is provided as Attachment A). Respondent must send any request for a hearing to:

Regional Hearing Clerk (3RC00)
U.S. EPA Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

A copy of Respondent's Answer and all other documents that Respondent files in this action should be sent to Yvette C. Roundtree, the attorney assigned to represent EPA in this matter, at:

Yvette C. Roundtree (3RC13)
Assistant Regional Counsel
U.S. EPA Region III
841 Chestnut Building
Philadelphia, PA 19107
(215) 597-2486

If the Respondent fails to request a hearing within the designated time period [illegible] EPA may issue a final Order assessing the proposed administrative penalty. In accordance with 5 U.S.C. 554, 42 U.S.C. §11045(f), Respondent may file a petition for judicial review of any final Order with the appropriate District Court of the United States within thirty (30) days from the date of such final Order and by simultaneously sending a copy of such notice by certified mail to the EPA Administrator.

SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, an informal conference may be requested in order to discuss the facts of this case and to arrive at a settlement. To request an informal settlement conference, please write to or telephone:

Yvette C. Roundtree (3RC13)
Assistant Regional Counsel
EPA Region III
841 Chestnut Building
Philadelphia, PA 19107
(215) 597-2486

Please note that a request for, the scheduling of, or the participation in an informal settlement conference does not extend the twenty (20) day period during which a written Answer and Request for Hearing must be submitted as set forth above.

The informal settlement conference procedure, however, may be pursued simultaneously with the adjudicatory hearing procedure.

EPA encourages all parties against whom a civil penalty is proposed to pursue settlement through an informal conference. In the event settlement is reached, its terms shall be expressed in a written Consent Agreement prepared by Complainant, signed by the parties and incorporated into a final Order signed by the Regional Administrator or his delegatee. SETTLEMENT CONFERENCES SHALL NOT AFFECT THE REQUIREMENT TO FILE A TIMELY ANSWER TO THE COMPLAINT.

SEPARATION OF FUNCTIONS AND EX PARTE COMMUNICATIONS

The following EPA offices, and the staffs thereof, are designated as the trial staff to represent EPA as a party in this case: The Region III Office of Regional Counsel; the Region III Hazardous Waste Management Division; the Office of the EPA Assistant Administrator for Solid Waste and Emergency Response; and the Office of the EPA Assistant Administrator for Enforcement and Compliance Assurance. From the date of this Complaint until the final Agency decision in this case, neither the Administrator, members of the Environmental Appeals Board, Presiding Officer, Regional Administrator, nor the Regional Judicial Officer, shall have any ex parte communication with the EPA trial staff or the Respondent on the merits of any issues

involved in this proceeding. Please be advised that the Consolidated Rules prohibit any unilateral discussion or ex parte communication of the merits of a case with the Administrator, members of the Environmental Appeals Board, Presiding Officer, Regional Administrator, or the Regional Judicial Officer after issuance of a Complaint.

Dated: 9/29/95

Thomas C. Voltaggio,
Director
Hazardous Waste Management Division
U.S. EPA Region III

Appendix C

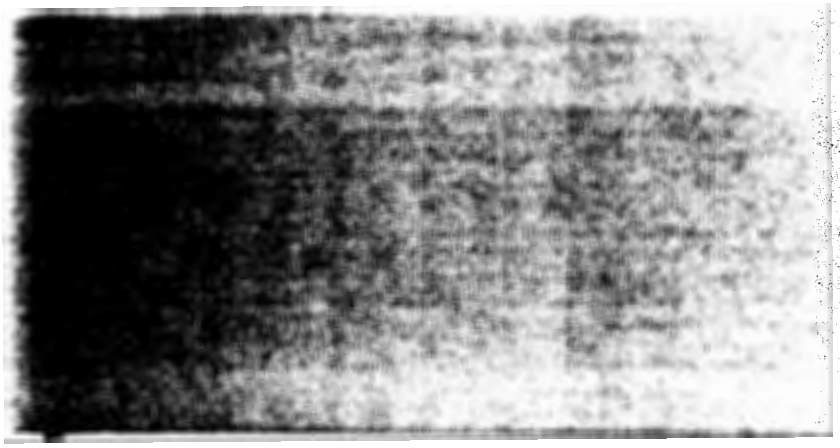
Certificate of Service

I certify that on the date [illegible] I caused a copy of this "ADMINISTRATIVE COMPLAINT", a copy of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and Revocation or Suspension of Permits, 40 C.F.R. Part 22, and a copy of the Administrative Penalty Procedures, to be sent by certified mail, return receipt requested, to the addresses listed below:

David Pasquale
President
COL-FIN SPECIALTY STEEL CORPORATION
100 Front Street
Fallston, Pennsylvania 15066

Date: 9/24/95

Yvette C. Roundtree (3RC13)
Assistant Regional Counsel
U.S. EPA Region III
841 Chestnut Building
Philadelphia, PA 19107



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

JUN 13 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Steven Brown, Plant Engineer
Col-Fin Specialty Steel Corporation
Front Street
Fallston, PA 15066

Re: Emergency Planning and Community Right to Know Act
Notice of Noncompliance, ID No. 03-95-0164 (NPL)

Dear Mr. Brown:

On June 7, 1994, the Environmental Protection Agency (EPA) conducted a routine inspection at Col-Fin Specialty Steel Corporation, located in Fallston, PA, to determine the facility's compliance with Section 313 of Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42, U.S.C. § 11023, and the regulations codified at 40 C.F.R. Part 372.

Based upon evidence obtained during the June 7, 1994 inspection, EPA has determined that Col-Fin Specialty Steel Corporation was in violation of the reporting requirements of EPCRA, Section 313 and 40 C.F.R. §§ 372.22 and 372.30.

Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. §§ 372.22 and 372.30 require the owner or operator of a facility that:

1) has 10 or more employees;
2) has a primary Standard Industrial Classification ("SIC") code (as in effect on July 1, 1987) between 2000 and 3999; and
3) manufactured at least 25,000 pounds (effective 1989 and thereafter), processed at least 25,000 (effective 1989 and thereafter), or "Otherwise-used" at least 10,000 pounds (effective 1987 and thereafter) of a toxic chemical listed in 40 C.F.R. § 372.65, during the calendar year for which the form is required;

to complete and submit a toxic chemical release form (Form R) for each such toxic chemical to EPA and the state in which the facility is located, by July 1 of the next calendar year. (The reporting deadline for 1991 was administratively extended to September 2, 1992.)

Information obtained during the June 7, 1994 inspection indicates that your facility has a primary SIC code of 3315, has

Appendix E

Appendix C

greater than 10 [illegible] 1990, 1991, and 1992, [illegible] and "otherwise used" quantities greater than 10,000 pounds of Sulfuric Acid during 1990, 1991, and 1992. Zinc Compounds and Sulfuric Acid are "toxic chemicals" as defined by 40 C.F.R. § 372.3 and listed in 40 C.F.R. § 372.65. Thus, your facility was required to submit a completed toxic chemical release form for Zinc Compounds covering the 1992 reporting year on or before the July 1, 1993 reporting deadline, and for Sulfuric Acid covering the 1990, 1991, and 1992 reporting years on or before the July 1, 1991, September 2, 1992, and July 1, 1993 reporting deadlines, respectively to the Administrator of EPA and the Commonwealth of Pennsylvania. EPA's records indicate that Col-Fin Specialty Steel Corporation submitted its toxic chemical release reports for Zinc Compounds for calendar year 1992 and Sulfuric Acid for calendar years 1990, 1991, and 1992 on October 17, 1994, after the required reporting deadlines.

Each late submission of a required toxic chemical release form constitutes a violation of Section 313 of EPCRA, 42 U.S.C. § 11023, which can result in civil administrative penalties of up to $25,000 per violation. Although you are receiving a Notice of Noncompliance for these violations at this time, any further violation of EPCRA by your facility may result in the issuance of a Civil Administrative Complaint for the assessment of penalties for this and other violations. In the future, you should ensure that your facility submits the required reports in accordance with all statutory requirements.

If you have questions concerning this Notice of Noncompliance, contact Mr. Craig E. Yussen of my staff at (215) 597-7683.

Sincerely,

Elaine B. Wright, Director
Air, Radiation and Toxics Division
U.S. Environmental Protection Agency

cc: James Tinney
PA Emergency Response Commission

Appendix C

SARA TITLE III SECTION 313 INSPECTION REPORT
94-313U-044

I. **Facility**
Col-Fin Specialty Steel Corp.
Front Street
P.O. Box 562
Fallston, PA 15066

SIC 3315

II. **Date of Inspection**
June 7, 1994

III. **EPA Inspector** CEY for MR. 7/14/94
Malcolm Reynolds
Technical Advisor
TSCA Enforcement and TRI Section (3AT31)
(215) 597-3659

IV. **Company Officials**
Mr. Steven Brown - Plant Engineer
412 843-7315

V. **Purpose of Inspection**

Col-Fin Specialty Steel Corp. is a manufacturer of alloy steel and stainless steel and has not submitted a Form R under Section 313 of SARA Title III for the following reporting years: 1990, 1991, 1992. This inspection was conducted to inspect, document, and verify the facility's compliance with the reporting requirements stated in 40 C.F.R. Part 372 under Section 313 of SARA Title III.

VI. **Opening Conference**

1. **Inspection Procedures and General Information**

On June 7, 1994, a Section 313 inspection was conducted at Col-Fin Specialty Steel Corp. Approximately 12 days prior to the inspection a letter was sent to the company confirming the date of the inspection (attachment D). The EPA inspector met with company representatives at 9:30 a.m. The inspector's credentialos were presented and a Notice of Inspection was presented and explained. Mr. Brown signed the notice and an outline of the areas ato be investigated was discussed.

2. **Facility Description**

Col-Fin Specialty Corp. is privately owned. Mr. Brown is responsible for environmental matters. The Falston, PA. plant is the only plant and serves as the headquarters as well. The facility produces cold finished steel bars, tool steel specialties, and stainless steel.

VII. SARA Title III

Section 313 was the primary focus of the inspection. The facility was phoned prior to the inspection to determine if an inspection was warranted (attachment E). In addition, compliance with Sections 302,311, and 312 was checked. A copy of athe letter sent to the facility confirming the date of inspection (attachment D) was sent to the Superfund Removal Branch to allow them the option to further investigate compliance with Sections 302, 311, and 312 at their discretion.

A plant, factory, or other facility comes under the provisions of Section 313:

1. If it conducts manufacturing operations (that is if its primary Standard Industrial Classification Code (SIC) is from 2000 through 3999;

2. If, in addition, it has 10 or more full-time employees; and

3. If it manufactures (including imports) or processes more than 50,000 lbs. during calendar year 1988, or manufactures (including imports) or processes more than 25,000 lbs. during calendar year 1989 or later, or otherwise uses more than 10,000 pounds of a listed toxic chemical during any calendar year.

Mr. Brown stated that the plant's primary SIC Code is 3315 and the plant had 53,53,57 employees in the following calendar years: 1990, 1991, 1992. The remainder of the inspection involved determining if the plant manufactured, processed, or otherwise used any one of the listed toxic chemicals in excess of the thresholds in calendar years 1990, 1991, and 1992.

Mr. Brown stated that the facility does not manufacture any chemicals at their plant and no chemicals are imported into the facility.

For the inspection, they had compiled summaries of usages of Section 313 chemicals as shown in attachment #1. Section 313 chemicals used are summarized as follows:

	1990 lbs.	1991 lbs.	1992 lbs.
Sulfuric Acid* 100% Basis	161,994	163,856	169,070
Phosphoric Acid** 100% Basis		5,136	7,046
Nitric Acid* 100% Basis		5,136	7,046
Manganese**	13,292	10,573	8,693
Chromium**	11,099	11,664	12,294
Nickel**	17,569	10,487	16,171
Lead**	3,003	3,721	3,385
Propylene**		5,900	10,400
Zinc compounds**	14,336	16,384	28,160

Sulfuric acid is used in pickling operation. Spent sulfuric acid is recycled in process. Unusable sulfuric acid is sent off site and treated. The metals are part of the final product. Propylene is used to case harden steel by the gas carburizing process. Carbon atoms from the propylene become part of the product. The zinc compounds become a coating on the product.

*Otherwise used
**Processed

VIII. Closing Conference

Appropriate documents were requested by the EPA Inspector and the SARA Title III Section 313 investigation was concluded. Receipt for Samples and Documents was filled out at the end of all inspection activities.

ATTACHMENT A

NOTICE OF INSPECTION

U.S. ENVIRONMENTAL PROTECTION AGENCY

Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA)

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.		
6/7/94	ERIII-001	01	9:30am	Col-Fin Specialty Steel Corp.
4. INSPECTOR ADDRESS USEPA Region 3, 3AT31 841 Chestnut Bldg. Phila. PA 19107				5. FIRM ADDRESS Front St. New Brighton, PA 15066

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with the Emergency Planning and Community Right-to-Know Act of 1986, Section 313 toxic chemical release reporting requirements. The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
Malcolm Reynolds		Stephen D Brown	
NAME		NAME	
Malcolm Reynolds		STEPHEN D BROWN	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Technical Assistant	6/7/94	PLT ENG	6/7/94

EPA FORM 3540-35 (8-93)

ORIGINAL

*U.S. GPO: 1993-342-137/80115

ATTACHMENT 3

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA Superfund Amendments and Reauthorization Act - Title III Emergency Planning and Community Right-to-Know Act of 1986

RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved. OMB No. 2070-0007 Approval expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE: 6/7/94	INSPECTOR NO.: ERTII-001	DAILY SEQ. NO.: 01	Col-Fin Specialty Steel Corp.

3. INSPECTOR ADDRESS	4. FIRM ADDRESS
U.S. EPA Region 3, 3AT31 841 Chestnut Bldg. Philadelphia PA 19107	Front St. New Brighton PA 15066

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Emergency Planning and Community Right-to-Know Act of 1986.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
	To Send: List & Weights of Applicable Elements in Steel Processed for '90 '91 '92 Weights concerning Sulfuric for 90' 91 '92 Weights concerning Phosphoric for 91' 92 NA in 90' Weights concerning Nitric if applicable for 91' 92 Number of Employees for 90' 91 '92 Due 7/1/94

Chemical identities for underlined items have been claimed as trade secret. The facility official requesting such treatment has read and understands EPCRA Section 322 and pertinent trade secret regulations and understands EPCRA Section 325 which provides for (among other things) penalties for frivolous claims.

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
Malcolm Reynolds		Stephen D Brown	
NAME: Malcolm Reynolds		NAME: STEPHEN D. BROWN	
TITLE: Technical Assistant	DATE SIGNED: 6/7/94	TITLE: PLT ENG	DATE SIGNED: 6/7/94

EPA Form 7740-1 (12-82)

FIFRA/TSCA TRACKING SYSTEM INPUT DOCUMENT: INSPECTIONS
TSCA, OTHER THAN ASBESTOS
****

(FIELDS IN BOLD ARE REQUIRED !)

FORM COMPLETED BY: Malcolm Reynolds

INSPECTION DATE: 6/7/94 **INSPECTOR NUM:** ERIII-001 **SEQUENCE:** 01

FILE# 94-3130-044

LEGISLATION IND: E **INSPECTION TYPE:** EEA **INSPECTION STATUS:** C
(see reverse)

REGION/STATE: 03 **INSPECTOR NAME:** Reynolds
(03 PA DE MD VA WV DC) (last name)

REASON FOR INSPECT: MSR **REFERRAL TYPE:** RR **NUMBER SAMPLES:** 0
(see reverse) (see reverse)

REPORT RECEIVED: __/__/__

CBI: N (Y/N) **WARRANT REQUIRED:** N (Y/N)

FACILITY FUNCTION: MN **FED FACILITY:** N (Y/N)
(see reverse)

REMARKS: _____

SITE NAME: Col-Fin Specialty Steel Corp.
SITE ADDR: Front St.
SITE CITY: Fallston **SITE STATE:** PA
SITE ZIP: 15066
SITE SIC CODES: 3315 ____ ____ ____ ____ ____
(see reverse)

PARENT CO NAME: _____
PARENT CO ADDR: _____
PARENT CO CITY: _____
PARENT CO STATE: _____ **PARENT CO ZIP:** _____

GENERIC FIELDS

IDENTIFIER: _____
DATE REPORT COMPLETED: __/__/__
FIELD CITATION: __ (Y/N)
LONGITUDE: _____ (degrees, minutes, seconds)
LATITUDE: _____ (degrees, minutes, seconds)

For **INSPECTION TYPE, REASON FOR INSPECTION, REFERRAL TYPE, FACILITY FUNCTION, SIC CODES,** see reverse.

TSCA INVESTIGATION TYPE CODES

CODE	DESCRIPTION
13I	SECTION 13 IMPORTER INSPECTION
13R	SECTION 13 RECORDS REVIEW
2XP	SECTION 12 EXPORT
4CI	FOR SECTION 4 INSPECTIONS
4EE	SECTION 4 ECOLOGICAL EFFECTS DATA AUDIT
4HE	SECTION 4 HEALTH EFFECTS DATA AUDIT
4LP	SECTION 4 GOOD LABORATORY PRACTICES
5DE	SECTION 5 CHEMICAL SUBSTANCE EXEMPTION
5CI	FOR SECTION 5 INSPECTIONS
5EF	SECTION 5 (E) OF (F) ORDER
5FN	SECTION 5 FAILURE TO NOTIFY
5PM	SECTION 5 PREMANUFACTURE NOTICE
5SU	SECTION 5 SIGNIFICANT NEW USE RULE
5TM	SECTION 5 TEST MARKETING EXEMPTION
6AA	SECTION 6 ASBESTOS AHMP CONDUCTED
6AF	SECTION 6 ASBESTOS FEDERAL CONDUCTED
6AS	SECTION 6 ASBESTOS STATE CONDUCTED
6CF	SECTION 6 CHLOROFLOUROCARBONS
6CI	FOR SECTION 6 INSPECTIONS
6CR	SECTION 6 HEXAVALENT/CHROMIUM
6CS	STATE HEXAVALENT CHROMIUM
6DX	SECTION 6 DIOXIN
6PA	SECTION 6 PCB AHMP CONDUCTED
6PF	SECTION 6 PCB FEDERAL CONDUCTED
6PS	SECTION 6 PCB STATE CONDUCTED
6WA	SEC.6 ASBESTOS WORKER PROTECTION AHMP
6WF	SEC.6 ASBESTOS WORKER PROTECTION FEDERAL
6WS	SEC.6 ASBESTOS WORKER PROTECTION STATE
7CI	FOR SECTION 7 INSPECTIONS
71H	SECTION 7 IMMINENT HAZARD
8AS	SECTION 8A ASBESTOS RULE
8CI	SECTION 8 CONFIDENTIAL INSPECTIONS
8CR	SECTION 8C RECORDS RULE
8HS	SECTION 8D HEALTH AND SAFETY STUDIES
8LA	SECTION 8A LEVEL A RULE
8NV	SECTION 8 INVENTORY RULE
8SH	SECTION 8E SUBSTANTIAL RISK
ACU	ASBESTOS AHERA CLOSE OUT
AEA	AHERA, ENFORCEMENT, AHMP CONDUCTED
AEF	AHERA, ENFORCEMENT, FEDERAL CONDUCTED
AES	AHERA, ENFORCEMENT, STATE CONDUCTED
AOM	ASBESTOS AHERA OM &M
APA	ASBESTOS AHERA PRE AHERA
AUN	ASBESTOS AHERA UNKNOWN
EEA	EPCRA, ENFORCEMENT, AHMP CONDUCTED
EEF	EPCRA, ENFORCEMENT, FEDERAL CONDUCTED

TSCA FACILITY FUNCTION CODES

CODE	DESCRIPTION
BK	BROKER
CV	CONVEYOR
DA	PERMITTED DISPOSER - ALTERNATIVE METHODS
DH	PERMITTED DISPOSER - HIGH EFFIC BOILERS
DI	PERMITTED DISPOSER - INCINERATOR
DL	PERMITTED DISPOSER - LANDFILL
DM	PERMITTED DISPOSER - DREDGE/SLUDGE WATER
DP	DISPOSER
DR	PERMITTED DISPOSER - RESEARCH/DEVELOP
DT	DISTRIBUTOR
LB	LABORATORY
MI	MANUFACTURER/IMPORTER
MM	MANUFACTURER
PC	PROCESSOR
PS	SECONDARY PROCESSOR
PT	PORT OF ENTRY
ST	STORER
US	USER

TSCA REFERRAL CODES

CODE	DESCRIP
27	SECTION 26/27 REFERRE
HR	HEADQUARTERS TO REGION
RH	REGION TO HEADQUARTERS
RR	REGION TO REGION REFER
RS	REGION TO STATE REFERR
SR	STATE TO REGION REFERR

TSCA REASON FOR INSPECTION CODES

CODE	DESCRIPTION
FCA	FOR CAUSE, ASSOCIATED
FCD	FOR CAUSE, DISPOSAL
FCF	FOR CAUSE, FOLLOW-UP
FCG	FOR CAUSE, GOVERNMENT
FCH	FOR CAUSE, HEADQUARTERS
FCP	FOR CAUSE, PRIVATE CITIZEN/PRESS COMPLAI
FCR	FOR CAUSE, REGULATED COMMUNITY COMPLAINT
FCV	FOR CAUSE, VIOLATION
NSA	NEUTRAL SCHEME, ASSOCIATED
NSF	NEUTRAL SCHEME, FOLLOW-UP
NSH	NEUTRAL SCHEME, HEADQUARTERS
NSI	NEUTRAL SCHEME INDIAN TRIBE
NSR	NEUTRAL SCHEME, REGION
NSS	NEUTRAL SCHEME, STATE
OVR	SMC OVERVIEW INSPECTION
SCD	SECONDARY INSPECTION

SIC Code	Code Description
07	Agricultural Services
90	Alternate Disposal/Disposal
93	Broker
15	Construction
1799	Contractor/Disposal/Waste Oil
82	Educational Services
7629	Electrical Equipment Repair
91	Electrical Equipment Retrofill
91	Hazardous Waste Handler
80	Health Services

SIC Code	Code Description
86	Nonprofit Membership Organization
6512	Office/Commercial Building
8999	Other
40	Railroad
4222	Refrigerated Warehousing
7391	Research and Development Lab
5999	Scrapyard
4952	Sewage Treatment
8922	State/Municipal Facility
4226	Storage Facility
4911	Utility, Electric
4923	Utility, Gas
92	Waste Oil Dealer
24	Lumber and Wood Products
28	Manufacturing, Chemical
36	Manufacturing, Electrical Equipment
20	Manufacturing, Food/Feed
34	Manufacturing, Metal Products
39	Manufacturing, Miscellaneous
30	Manufacturing, Rubber/Plas

Attachment D

FILE COPY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

MAY 23 1994

Mr. Steve Brown
Col-Fin Specialty Steel Corp.
Front Street
P.O. Box 562
New Brighton, PA 15066

RE: Superfund Amendments and Reauthorization Act (SARA) Title III Section (§)313 Inspection

Dear Mr. Brown:

This is to confirm that Mr. Malcolm B. Reynolds of my staff will visit your facility on Tuesday, June 7, 1994 at 9:30 a.m. to conduct a SARA Title III Section 313 inspection. Mr. Reynolds is a member of the National Council of Senior Citizens designated by the EPA Administrator to conduct inspections under SARA Title III.

To save time during the inspection, please have available for review and collection by the inspector the following documents for the 1990, 1991, and 1992 calendar years:

- A list of all EPCRA § 313 chemicals used for each year specified above;
- Annual usage summaries (pounds) of each EPCRA §313 chemical with supporting documentation for each year indicated above (supporting documentation should include such items as beginning and end-of-year inventory, purchase records, and if applicable, import records);
- Chemical production records for all §313 chemicals manufactured at the facility.

  Note: If your facility manufactures, processes, or uses mixtures which contain Section 313 chemicals, please provide for each of these mixtures a copy of the material safety data sheet (MSDS), or other written notification which specifies the chemical composition of the mixture.

In addition to the above items, please notify him of any safety equipment (e.g. eye or ear protection, safety shoes, hard hat, etc.) he should bring with him to the inspection. If time permits, he will tour your plant.

If you have any questions, please call him at (215) 597-3659.

Sincerely,

Craig E. Yussen
EPCRA Section 313 Compliance
Coordinator, EPA Region III

cc: Section 313 State Contact
Stephanie Branch-Wilson (3HW34)

Inspec... June 7, 94 9:20

Attachment E

Appendix I

EPA REGION III

INITIAL TELEPHONE CALL RECORD

Facility Name: Col-Fin Special Ty Steel Corp Date of Call: 5/19/94

Facility Address: Front St. 15066
P.O. Box 562
New Brighton Beaver Co.

Facility Contact: Pres. David Pasquale, Prod. Man. Kurt Shaffer

Phone Number: 412 843-7315 FAX 847-7079
(Steve Brown will call back)

Inspector Making Call: Malcolm Reynolds
E-56 Cold finished steel bar & coils
SIC 3316 Sent Form R 90, 91, 92, 93 & Fact Sheet and Metals on 5/19

QUESTIONS

1) **Are you familiar with SARA Title III?** yes____ no____
(If yes, move to question 2. If no, give brief explanation)

2) **Are you familiar with Section 313 of SARA Title III?** yes____ no____
(If yes, move to question 3. If no, give brief explanation)

3) **Did you report under Section 313 for the 1990 reporting year?** yes____ no____

4) **Did you report under Section 313 for the 1991 reporting year?** yes____ no____

5) **Did you report under Section 313 for the 1992 reporting year?** yes____ no____

6) SIC Code: _____

7) Nature of Business? (i.e do you do any manufacturing or process at your site or are you just a distribution or sales center?)

_____

_____

_____

8) # of Employees: 1990:____; 1991:____; 1992:____

9) Do you use any chemicals at your facility? yes____ no____

10) Do you use any Section 313 listed chemicals? yes____ no____
313 Listed Chemicals:_____

_____

11) Did you determine if you were subject to Section 313 reporting? yes____ no____

12) Did your facility report under §§ 302 (notification of SERC if an EHS is present on your site at quantities above the TPQs) and 303 (if subject to §302, notified LEPC of a selection of a facility representative)? yes____ no____

13) Did your facility report under § 311 (submission of MSDSs or list of MSDs chemicals to SERC, LEPC, and local fire department by 10/17/87 if applicable thresholds were exceeded)? yes____ no____

14) If your facility needed to comply with § 311, did your facility submit the required Tier I or Tier II forms to the appropriate agencies for:

a) the 1990 reporting year by 3/1/91? yes____ no____

b) the 1991 reporting year by 3/1/92? yes____ no____

c) the 1992 reporting year by 3/1/93? yes____ no____

15) Did phone call result in an inspection yes____ no____

If yes, date and time _____

16) Comments: _____

_____

			Year	1990					
GRADE	TOT WT	% Mn	% Cr	% Ni	% Pb	WT Mn	WT Cr	WT Ni	WT Pb
1117	130767	1.15				1504	0	0	0
1137		1.5				0	0	0	0
1141	24205	1.5				363	0	0	0
1144	301459	1.5				4522	0	0	0
11L17	56907	1.15				654	0	0	0
11L37	105327	1.5				1580	0	0	0
11L44	157579	1.5				2364	0	0	0
1215	225200	0.9				~~2027~~	0	0	0
12L14	158955	0.9			0.25	~~1481~~	0	0	397
12L14SE	695652	0.9			0.25	~~6261~~	0	0	1739
1524	153733	1.5				2306	0	0	0
40L37	289641				0.25	0	0	0	724
4118	53020		0.5			0	265	0	0
4130			0.95			0	0	0	0
4130H			0.95			0	0	0	0
4137	58863		0.95			0	559	0	0
4137H			0.95			0	0	0	0
4140	28069		0.95			0	267	0	0
4150			0.95			0	0	0	0
41L40	11990		0.95		0.25	0	114	0	30
41L50	45141		0.95		0.25	0	429	0	113
4325	183754			1.8		0	0	3308	0
4325 MOD				1.8		0	0	0	0
4340	57168			1.8		0	0	1029	0
52100	263099		1.45			0	3815	0	0
6150	470174		0.95			0	4467	0	0
8615	10647			0.5		0	0	53	0
8620	54193			0.5		0	0	271	0
8620H	154152			0.5		0	0	771	0
8630	229722			0.5		0	0	1149	0
8630H	65229			0.5		0	0	326	0
8640	10955			0.5		0	0	55	0
8650	1884785			0.5		0	0	9424	0
S-2	986684		0.12	0.12		0	1184	1184	0
S-2 MOD			0.15			0	0	0	0
TOTAL WT OF ELEMENTS						23011	11099	17569	3003

13 292

			Year	91					
GRADE	TOT WT	% Mn	% Cr	% Ni	% Pb	WT Mn	WT Cr	WT Ni	WT Pb
1117	178765	1.15				2056	0	0	0
1137		1.5				0	0	0	0
1141		1.5				0	0	0	0
1144	328640	1.5				4930	0	0	0
11L17	23230	1.15				267	0	0	0
11L37	22048	1.5				331	0	0	0
11L44	145843	1.5				2188	0	0	0
1215	125268	0.9				1127	0	0	0
12L14	387097	0.9			0.25	3484	0	0	968
12L14SE	673097	0.9			0.25	6058	0	0	1683
1524	53479	1.5				802	0	0	0
40L37	274405				0.25	0	0	0	686
4118	82200		0.5			0	411	0	0
4130			0.95			0	0	0	0
4130H			0.95			0	0	0	0
4137			0.95			0	0	0	0
4137H	6333		0.95			0	60	0	0
4140	10623		0.95			0	101	0	0
4150	14056		0.95			0	134	0	0
41L40	40481		0.95		0.25	0	385	0	101
41L50	113430		0.95		0.25	0	1078	0	284
4325	81809			1.8		0	0	1473	0
4325 MOD	14689			1.8		0	0	264	0
4340	32064			1.8		0	0	577	0
52100	388380		1.45			0	5632	0	0
6150	340288		0.95			0	3233	0	0
8615	6591			0.5		0	0	33	0
8620	17158			0.5		0	0	86	0
8620H	97258			0.5		0	0	486	0
8630	182661			0.5		0	0	913	0
8630H	27436			0.5		0	0	137	0
8640	10997			0.5		0	0	55	0
8650	1166191			0.5		0	0	5831	0
S-2	526518		0.12	0.12		0	632	632	0
S-2 MOD			0.15			0	0	0	0
TOTAL WT OF ELEMENTS						21242	11664	10487	3721

10 573

			Year	1992					
GRADE	TOT WT	% Mn	% Cr	% Ni	% Pb	WT Mn	WT Cr	WT Ni	WT Pb
1117	82407	1.15				948	0	0	0
1137	9595	1.5				144	0	0	0
1141		1.5				0	0	0	0
1144	272367	1.5				4086	0	0	0
11L17	64412	1.15				741	0	0	0
11L37	63096	1.5				946	0	0	0
11L44	115550	1.5				1733	0	0	0
1215	183473	0.9				~~1651~~	0	0	0
12L14	565166	0.9			0.25	~~5086~~	0	0	1413
12L14SE	493248	0.9			0.25	~~4439~~	0	0	1233
1524	6269	1.5				94	0	0	0
40L37	12386				0.25	0	0	0	31
4118	243496		0.5			0	1217	0	0
4130	16908		0.95			0	161	0	0
4130H			0.95			0	0	0	0
4137			0.95			0	0	0	0
4137H	6334		0.95			0	60	0	0
4140	6414		0.95			0	61	0	0
4150	21891		0.95			0	208	0	0
41L40	126067		0.95		0.25	0	1198	0	315
41L50	157140		0.95		0.25	0	1493	0	393
4325	107335			1.8		0	0	1932	0
4325 MOD				1.8		0	0	0	0
4340	132246			1.8		0	0	2380	0
52100	187796		1.45			0	2723	0	0
6150	424842		0.95			0	4036	0	0
8615	6417			0.5		0	0	32	0
8620	20040			0.5		0	0	100	0
8620H	51140			0.5		0	0	256	0
8630	220410			0.5		0	0	1102	0
8630H	128518			0.5		0	0	643	0
8640	21237			0.5		0	0	106	0
8650	1905221			0.5		0	0	9526	0
S-2	78303		0.12	0.12		0	94	94	0
S-2 MOD	695320		0.15			0	1043	0	0
TOTAL WT OF ELEMENTS						19869	12294	16171	3385

8693

1993

GRADE	TOT WT	% Mn	% Cr	% Ni	% Pb	WT Mn	WT Cr	WT Ni	WT Pb
1117	369962	1.15				4255	0	0	0
1137	9336	1.5				140	0	0	0
1141	96836	1.5				1453	0	0	0
1144	509954	1.5				7649	0	0	0
11L17	56388	1.15				648	0	0	0
11L37	53110	1.5				797	0	0	0
11L44	93259	1.5				1399	0	0	0
1215	129826	0.9				~~1168~~	0	0	0
12L14	829901	0.9			0.25	~~7460~~	0	0	2075
12L14SE	520672	0.9			0.25	~~4686~~	0	0	1302
1524	13710	1.5				206	0	0	0
40L37	264820				0.25	0	0	0	662
4118	189423		0.5			0	947	0	0
4130	32930		0.95			0	313	0	0
4130H	5965		0.95			0	57	0	0
4137	6390		0.95			0	61	0	0
4137H	8233		0.95			0	78	0	0
4140	16714		0.95			0	159	0	0
4150	138353		0.95			0	1314	0	0
41L40	56394		0.95		0.25	0	536	0	141
41L50	99226		0.95		0.25	0	943	0	248
4325	92333			1.8		0	0	1662	0
4325 MOD	12503			1.8		0	0	225	0
4340	27266			1.8		0	0	491	0
52100	531026		1.45			0	7700	0	0
6150	1083970		0.95			0	10298	0	0
8615	4297			0.5		0	0	21	0
8620	31627			0.5		0	0	158	0
8620H	167750			0.5		0	0	839	0
8630	269141			0.5		0	0	1346	0
8630H	114197			0.5		0	0	571	0
8640	23276			0.5		0	0	116	0
8650	2198423			0.5		0	0	10992	0
S-2	170434		0.12	0.12		0	205	205	0
S-2 MOD	507011		0.15			0	761	0	0
TOTAL WT OF ELEMENTS						29870	23370	16626	4428

16547

COL-FIN
Specialty Steel Corp.

Cold Finished Steel Bars
Ground and Polished Bars
Tool Steel Specialties
Stainless Steels

June 29,1994

Mr. Malcolm Reynolds
U.S. EPA Region 3,3AT31
841 Chestnut Bldg.
Philadelphia, PA 19107

Reference: Inspection visit of June 7, 1994

Dear Mr Reynolds,

The following is the information you requested to be sent to you. I will also add that the reports will be sent out in todays mail.

1. List weight of applicable elements in steel processed for 1990 through 1992.

   See attachment of a breakdown of the grades processed and the weight of element. 1993 is the first year that manganese exceeded the 25000# limit.

2. List weight of sulfuric acid used for 1990 through 1992

   1990 – 174,000# 161994 1991 – 176,000# 163956 1992 – 181,600# 169,070 66°Be 93.1%

3. List weight of phosphoric and nitric acid for 1991 and 1992.

Chemical		1991	1992
Phosphoric	100% Basis	5136	7046
Nitric	100% Basis	5136	7046

   The new MSDS sheets listed both these chemicals at 10% which puts them less than the use category of 10,000# .

4. The number of employees for each year 1990 through 1992 is:

   1990 – 53 1991 – 53 1992 – 57

I would like to thank you for the help on determining the need to report. This will not be deliquent again.

Sincerely
Col-Fin Specialty Steel Corp.
Steph D Brown

Steve Brown
Plant Engineer

P.O. Box 562 • Front Street • Fallston, PA 15066 • 412-843-7315 • Fax 412-847-7079

COL-FIN Specialty Steel Corp.
P.O. Box 562 Front Street
Fallston, PA 15066
Phone: 412-843-7315
Fax: 412-847-7079

Fax Message

Date: July 11, 1994

To: Malcolm Reynolds

CC:

At: US EPA Region 3,3AT31
841 Chestnut Bldg.
Philadelphia, PA 19107

From: Steve Brown

No. of Pages: 1 Including cover sheet

Ref: Zinc Phosphate Solution quantities for "90" "91" "92" "& "93"

1990 35840# X.4 = 14336
1991 40960# X.4 = 16,384
1992 70400# X.4 = 28,160
1993 72960# X.4 = 29,184 ⇒ Zinc Compounds

30% Zinc Dihydrogen Phosphate
10% Zinc Nitrate
40% Zinc Compounds

We do need to report for 1992 & 1993.

I don't have any blank form R for 92 & 93 if you could fax me these I will fill them out and send them right away.

Thanks, Steve

Attachment 2

Kirk-Othmer Enclopedia of Chem. Tech.

depth. Higher carburizing temperatures, generally around 1700°F, are used for higher case depths.

Case depth is controlled primarily with the carburizing temperature and time. Harris (1) has developed the following formula which represents the effect of time and temperature on case depth (CD):

$$CD = \frac{31.6\sqrt{t}}{10^{(6700/T)}}$$

in which t is given in hours, T in °F + 460, and CD in inches.

By substituting various carburizing temperatures, the formula can be simplified to

$$CD = 0.025\sqrt{t} \text{ at } 1700°F$$
$$CD = 0.018\sqrt{t} \text{ at } 1600°F$$
$$CD = 0.015\sqrt{t} \text{ at } 1550°F$$

Carbon is absorbed into the surface of steel only when it is in the form of nascent carbon. The origin of the nascent carbon depends upon the particular carburizing process used: gas, liquid, or pack (solid) carburizing.

Gas carburizing is the most common process used. As the name of the process implies, nascent carbon is produced from the reaction of a gas, commonly called a carburizing atmosphere. Carburizing atmospheres are produced by a generated atmosphere and/or a hydrocarbon. The type of generated atmosphere most commonly used is known as an endothermic atmosphere produced by partially reacting controlled rich mixtures of air and gas in an externally heated chamber containing a nickel catalyst. The endothermic atmosphere is controlled to produce CO with very little CO_2. Since endothermic atmospheres with a high carbon potential tend to produce soot, the carbon potential is generally kept in the medium carbon range and hydrocarbon gases are added at the furnace inlet, enriching the carbon potential of the atmosphere and at the same time providing a means of control through metering equipment and carbon-potential controllers. When the generated gas is introduced into the sealed retorts or atmosphere furnaces at austenite temperatures, nascent carbon is produced by the equilibrium reaction

$$2\,CO \rightleftharpoons (C) + CO_2$$

Hydrocarbons, such as natural gas, propane, or vaporized hydrocarbon liquids, produce nascent carbon through thermal decomposition and through the equilibrium reaction

$$CH_4 \rightleftharpoons (C) + 2\,H_2$$

Vaporized hydrocarbon liquids are often used alone to produce the carburizing atmosphere. In these instances, the liquid is introduced into the furnace so that it strikes against a heated plate, called a target, within the furnace. This vaporizes the liquid almost instantaneously into a hydrocarbon gas. By carefully metering the liquid, the carbon potential of the atmosphere within the furnace can be controlled.

Most carburizing furnaces are of the batch type where each work load is separately processed. When high production is required, continuous furnaces are utilized. Forced circulation of the carburizing atmosphere within the furnace is generally

provided by a high-volume fan to promote uniformity in carburizing and furnace temperature.

The case produced in gas carburizing can be varied by controlling the carbon potential of the atmosphere, the temperature, and the time of the cycle. Control of these variables enables the carbon concentration gradient, hardness, and case depth to be controlled. This can be illustrated with light case depths below 0.030 in. total. A carburizing temperature of 1700°F will produce a total case depth of 0.030 in. total in approx 1.5 hr, as compared to 2.5 hr for a temperature of 1550°F. This lower temperature allows for more time to obtain a more nearly uniform case with better case-depth control, and time for the carbon concentration in the case to be higher. Conversely, higher total case depths obtained by carburizing at 1700°F may require a diffusion cycle at the end of the carburizing cycle to reduce a high-carbon concentration in the surface; especially if automatic carbon control of the atmosphere is not used. During the diffusion cycle, the carbon potential of the atmosphere is reduced, allowing the carbon concentration of the case to become lower through diffusion into the steel and into the furnace atmosphere.

Gas carburizing gives the best control of carbon content and case depth. In most ranges, the case depth can be controlled to within 0.004 in. Through the close control of carbon potential of the atmosphere and the temperature, the carbon gradient within the case can be varied to produce the desired transition between case and core. The process is versatile but the equipment costs are generally higher than for other carburizing processes.

Liquid carburizing utilizes a molten cyanide bath as the source for nascent carbon. Bath compositions are generally divided into two types, light-case and deep-case (Table 1).

Table 1. Liquid-Carburizing Bath Compositions

Constituents	Composition, %	
	Light-case	Deep-case
sodium cyanide	10–23	6–16
barium chloride	0–40	30–55
other alkaline earth compounds	0–10	0–10
potassium chloride	0–25	0–20
sodium chloride	20–40	0–20
sodium carbonate	30 max	30 max
accelerators (other than alkaline earths)	0–5	0–2
sodium cyanate	1.0 max	0.5 max

There is some overlap in bath compositions for the two types and as a result they are commonly referred to as low-temperature and high-temperature liquid carburizing baths, since the operating-temperature ranges normally used for the two provide a more distinguishable difference.

Low-temperature liquid carburizing baths are used predominately in the 1550–1650°F range. The range can be extended down to 1450°F when special effects are desired. The nascent carbon produced in this bath is the apparent result of a number of complex chemical reactions, occurring simultaneously. Among the significant

COL-FIN Specialty Steel Corp.
P.O. Box 562 Front Street
Fallston, PA 15066
Phone: 412-843-7315
Fax: 412-847-7079

Fax Message

Date: July 11, 1994

To: Malcolm Reynolds

CC:

At: US EPA Region 3,3AT31
841 Chestnut Bldg.
Philadelphia, PA 19107

From: Steve Brown

No. of Pages: 1 Including cover sheet

Ref: Zinc Phosphate Solution quantities for "90" "91" "92" "& "93"

1990 35840# x.4 = 14336
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30% Zinc Dihydrogen Phosphate
10% Zinc Nitrate
40% Zinc Compounds

We do need to report for 1992 & 1993.

I don't have any blank form R for 92 & 93 if you could fax me these I will fill them out and send them right away.

Thanks, Steve

PHOS DIP 47XD REPLENISHER

SECTION I - IDENTIFICATION

24 HOUR EMERGENCY ASSISTANCE:
413-543-3381 (EASTERN TIME) 8:00AM-5:00PM
800-424-9300 (OFF HOURS) CHEMTREC

HMIS HEALTH 3
HMIS FLAMMABILITY 0
HMIS REACTIVITY 0
HMIS PROTECTION X

HEATBATH CORPORATION
107 FRONT STREET
INDIAN ORCHARD, MASS. 01151

PREPARED BY: THOMAS A. NADEAU
INFORMATION: 413-543-3381
DATE: 05/11/1992

PRODUCT NAME..... PHOS DIP 47XD REPLENISHER
DESCRIPTION..... Chemical product for producing zinc phosphate coatings.

DOT CLASS:CORROSIVE LIQUIDS, N.O.S. (CONTAINS NITRIC AND PHOSPHORIC ACID)
CORROSIVE MATERIAL UN 1760 (RQ)

SECTION II - HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENT	CAS NUMBER	PEL(MG/M3)	TLV(MG/M3)	%
NICKEL NITRATE	13478-00-7	0.1 (NI)	0.1 (NI)	<1.0
NITRIC ACID	7697-37-2	2.0 PPM	2.0 PPM	1-10
PHOSPHORIC ACID	7664-38-2	1.0	1.0	1-10
ZINC DIHYDROGEN PHOSPHATE	7779-90-0	N.E.	N.E.	30-40
ZINC NITRATE	7779-88-6	N.E.	N.E.	10-20

N.E.=NOT ESTABLISHED N.A.=NOT APPLICABLE

SECTION III - PHYSICAL DATA

BOILING Point(F)..... >212 F SPECIFIC GRAVITY (H20=1).... 1.63
VAPOR PRESSURE (mm Hg).....Nil. MELTING POINT..... N.E.
VAPOR DENSITY (Air=1)..... N.E. EVAPORATION RATE.....N.E.
SOLUBILITY IN H20..... completely soluble. PH.....<1.0
APPEARANCE/ODOR.....odorless, green liquid.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT..... None. FLAMMABLE LIMITS.....None.
LOWER FLAME LIMIT..... N.A. HIGHER FLAME LIMIT..... N.A.
IN CASE OF FIRE: Material is nonflammable. Use extinguishing media appropriate to surrounding conditions.
SPECIAL FIREFIGHTING PROCEDURES: Wear protective clothing with self-contained breathing apparatus.
UNUSUAL FIRE HAZARDS: Contact with common metals may release flammable hydrogen gas. Contains oxidizer-increases the flammability of organics, combustibles and easily oxidizable materials.

SECTION V - REACTIVITY DATA

CHEMICAL STABILITY: STABLE CONDITIONS TO AVOID: None.
INCOMPATIBLE MATERIALS: strong alkali, cyanides, sulfides, oxidizable materials, combustibles, organics.
DECOMPOSITION PRODUCTS: steam, hydrogen, oxides of nitrogen, phosphoric oxides under thermal decomposition.
HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

SECTION VI - HEALTH HAZARD DATA

PHOS DIP 47XD REPLENISHER

ROUTES OF ENTRY: Inhalation, ingestion.
HEALTH HAZARDS (ACUTE,CHRONIC): Contains STRONG ACID. Causes eye, skin and tissue burns. May be harmful or fatal if swallowed. May cause respiratory tract irritation. Avoid contact with eyes, skin or clothing. Contains OXIDIZER. Contact with other material may cause fire.

CARCINOGENICITY: None. NTP?: No. IARC?: No. OSHA REGULATED?: No.

SYMPTOMS OF EXPOSURE: eye, skin and respiratory tract irritation. eye, skin and tissue burns.
MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Not known.

FIRST AID: INHALATION: Move victim to fresh air. If not breathing, give artificial respiration. If breathing is difficult,give oxygen. Get medical attention. EYES: Hold eyelids apart and flush with running water for at least 15 minutes. Get medical attention. SKIN: Wash affected area with plenty of water. Remove contaminated clothing. If irritation or burns are present, get medical attention. INGESTION: If conscious, give plenty of water followed by milk or milk of magnesia. Do not induce vomiting. Get medical attention.

SECTION VII - PRECAUTIONS/PROCEDURES

IN CASE OF SPILL: Contain spills with inert absorbant. Neutralize with soda ash or lime. Scoop up into a chemical waste container. Flush spill area with water.
WASTE DISPOSAL METHOD: Neutralize with soda ash or lime and dispose of in accordance with federal, state and local regulations.
PRECAUTIONS: Wear proper protective clothing when using this product. Wash thoroughly after handling. Use with adequate ventilation. Store away from strong alkali. When making a solution,never add water to acid. Always add acid slowly to water with constant stirring.
OTHER PRECAUTIONS: Emptied containers of this product may contain hazardous vapors and residue. Clean thoroughly before reusing or discarding. Do not use a welding torch to cut container. Do not use for water or food storage.

SECTION VIII - SPECIAL PROTECTION

RESPIRATORY PROTECTION: Use NIOSH/MSHA approved respirator if dust, fumes or vapors are excessive. VENTILATION: maintain below PEL, TLV.
MECHANICAL EXHAUST..... X. PROTECTIVE GLOVES: rubber.
LOCAL EXHAUST..... X. EYE PROTECTION: safety goggles, face shield.
OTHER PROTECTIVE EQUIPMENT..... apron,boots, full cover work clothes.
WORK/HYGIENIC PRACTICES..... wash thoroughly after handling,launder clothes.

SECT IX -SARA TITLE III INFORMATION

HAZARDOUS COMPONENT	CERCLA RQ LBS.	SECT 302 TPQ LBS.	SECT 313 TOXIC	SECT.311/312 HAZARDS
NICKEL NITRATE	N.A.	N.A.	YES	A,B,C
NITRIC ACID	1000	1000	YES	A,B,C
PHOSPHORIC ACID	5000	N.A.	YES	A
ZINC DIHYDROGEN PHOSPHATE	N.A.	N.A.	YES	A
ZINC NITRATE	1000	N.A.	YES	A,C

A=IMMEDIATE (ACUTE) HEALTH HAZARD B=DELAYED (CHRONIC) HEALTH HAZARD
C=FIRE HAZARD D=SUDDEN RELEASE OF PRESSURE HAZARD E=REACTIVE HAZARD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

FILE

JUN 13 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Steven Brown, Plant Engineer
Col-Fin Specialty Steel Corporation
Front Street
Fallston, PA 15066

Re: Emergency Planning and Community Right-to Know Act
Notice of Noncompliance, ID No. 03-95-0164 (NT)

Dear Mr. Brown:

On June 7, 1994, the Environmental Protection Agency (EPA) conducted a routine inspection at Col-Fin Specialty Steel Corporation, located in Fallston, PA, to determine the facility's compliance with Section 313 of Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42, U.S.C. § 11023, and the regulations codified at 40 C.F.R. Part 372.

Based upon evidence obtained during the June 7, 1994 inspection, EPA has determined that Col-Fin Specialty Steel Corporation was in violation of the reporting requirements of EPCRA, Section 313 and 40 C.F.R. §§ 372.22 and 372.30.

Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. §§ 372.22 and 372.30 require the owner or operator of a facility that:

1) has 10 or more employees;
2) has a primary Standard Industrial Classification ("SIC") code (as in effect on July 1, 1987) between 2000 and 3999; and
3) manufactured at least 25,000 pounds (effective 1989 and thereafter), processed at least 25,000 (effective 1989 and thereafter), or "otherwise-used" at least 10,000 pounds (effective 1987 and thereafter) of a toxic chemical listed in 40 C.F.R. § 372.65, during the calendar year for which the form is required;

to complete and submit a toxic chemical release form (Form R) for each such toxic chemical to EPA and the state in which the facility is located, by July 1 of the next calendar year. (The reporting deadline for 1991 was administratively extended to September 2, 1992.)

Information obtained during the June 7, 1994 inspection indicates that your facility has a primary SIC code of 3315, had

greater than 10 employees during calendar years 1990, 1991, and 1992, processed greater than 25,000 pounds of Zinc Compounds in 1992, and "otherwise-used" greater than 10,000 pounds of Sulfuric Acid during 1990, 1991, and 1992. Zinc Compounds and Sulfuric Acid are "toxic chemicals" as defined by 40 C.F.R. § 372.3 and listed in 40 C.F.R. § 372.65. Thus, your facility was required to submit a completed toxic chemical release form for Zinc Compounds covering the 1992 reporting year on or before the July 1, 1993 reporting deadline, and for Sulfuric Acid covering the 1990, 1991, and 1992 reporting years on or before the July 1, 1991, September 2, 1992, and July 1, 1993 reporting deadlines, respectively to the Administrator of EPA and the Commonwealth of Pennsylvania. EPA's records indicate that Col-Fin Specialty Steel Corporation submitted its toxic chemical release reports for Zinc Compounds for calendar year 1992 and Sulfuric Acid for calendar years 1990, 1991, and 1992 on October 17, 1994, after the required reporting deadlines.

Each late submission of a required toxic chemical release form constitutes a violation of Section 313 of EPCRA, 42 U.S.C. § 11023, which can result in civil administrative penalties of up to $25,000 per violation. Although you are receiving a Notice of Noncompliance for these violations at this time, any further violation of EPCRA by your facility may result in the issuance of a Civil Administrative Complaint for the assessment of penalties for this and other violations. In the future, you should ensure that your facility submits the required reports in accordance with all statutory requirements.

If you have questions concerning this Notice of Noncompliance, contact Mr. Craig E. Yussen of my staff at (215) 597-7683.

Sincerely,

Elaine B. Wright, Director
Air, Radiation and Toxics Division
U.S. Environmental Protection Agency

cc: James Tinney
PA Emergency Response Commission